

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TERRENCE J. HANCOCK, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 16 C 4329
)	
CHICAGOLAND TRUCKIN,)	JUDGE CHARLES R. NORGLER, SR.
INCORPORATED, an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, CHICAGOLAND TRUCKIN, INCORPORATED, an Illinois corporation, in the total amount of \$34,259.42, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,241.25.

On June 22, 2016, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Isidro Lopez, Office Manager) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 13, 2016. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 15th day of July 2016:

Mr. Alberto Roman, Registered Agent/President
Chicagoland Truckin, Incorporated
5494 W. Roosevelt Road
Chicago, IL 60644-1467

/s/ Laura M. Finnegan

Laura M. Finnegan
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